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July 8, 2003

### VIA ELECTRONIC FILING

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Dear Ms. Dortch:

Attached for filing is an Amendment to the Application for Renewal of Certification of the Telecommunications Relay Service of Puerto Rico, submitted on behalf of the Telecommunications Regulatory Board of Puerto Rico on October 1, 2002. This Amendment consists of a letter from the Senior Contracts Administrator of Sprint, the TRS provider in Puerto Rico, explaining that 900 Pay-per-Call service will be available in Puerto Rico, effective on August 1, 2003. We ask that you substitute the attached Page 11 of the Application for the Page 11 originally filed on October 1, 2002.

If you have any questions, please do not he sitate to contact the undersigned.

Respectfully submitted,

Veronica M. Ahern

Enclosures



Arrest Days

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June 18, 2003

Ms. Maria M. Reyes Guevara
Puerto Rico Telecommunications Regulatory Board
235 Avenida Arterial Hostos
Capital Center Torre Norte, Suite 1001
San Juan, Puerto Rico 00918-1453

Subject:

TRS 900 Service

Dear Ms. Reyes,

This is in response to your inquiry to Andrew Brenneman concerning the provision of 900 Payper-Call services through Puerto Rico's telecommunication relay service. While 900 service has been a standard feature of Sprint's TRS platform since 1995, this service was never implemented in Puerto Rico. Reviewing past correspondence concerning this issue, the reason for this appears to be because Sprint was under the impression that the Puerto Rico Telephone Company was ordered by the FCC to stop providing this service possibly in 1990 or 1991 and could not process 900 calls. This came to light in a phone conversation with Maria Casablanca and Omar Martinez of the PRTB on August 14, 2001.

I understand through our telephone conversation that the Puerto Rico Telephone Company can and does process 900 calls but does not handle the billing for those calls. After further research, this has been confirmed. Accordingly, Sprint has placed 900 pay-per-call service for Puerto Rico on our implementation schedule and this service will be available as of August 1, 2003. Attached to this letter as Exhibit A is the methodology Sprint Relay uses to process 900 calls.

To clarify another issue brought up in your e-mail, 900 Pay-per-Call service is not accessible through the 7-1-1 abbreviated dialing code for TRS. The 7-1-1 dialing code ties into the 800 toll free number servicing Puerto Rico Relay. This toll free number is answered in voice but can also process TTY, VCO and HCO calls. Due to the use of a 900 call-in number to process Pay-per-Call service, this service is not accessible through 7-1-1 abbreviated dialing.

Sprint stands ready to provide assistance as may be needed for the revision and resubmittal of Puerto Rico's TRS certification application to the FCC. Please let us know if we may be of assistance. In the mean time, if there are any further questions concerning these issues, please call me at (703) 904-2492. For assistance with the certification process, please contact Sprint's Account Manager for Puerto Rico, Elizabeth Rios at (787) 775-6775 phone/TTY.

Sincerely,

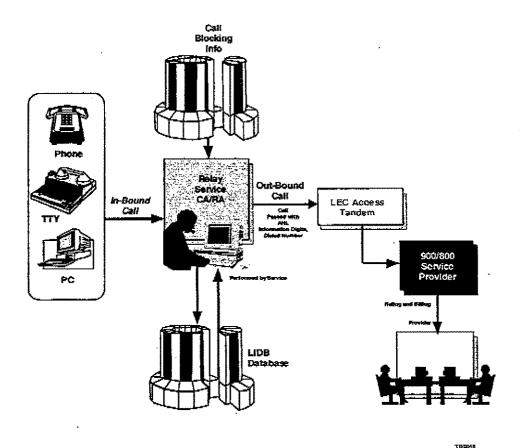
Don Rawlings

Senior Contracts Administrator

# PROCEDURE FOR PROCESSING 900 PAY-PER-CALL SERVICE

Callers to Sprint Relay access 900 services by dialing a free 900 number to access the relay service. Use of a toll free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls to the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier will rate and bill the user as if the call was dialed directly from the originating user's telephone.

The figure below illustrates access to 900 Pay-Per Call Services.



900 Pay-Per-Call Services

## **Future Technology under Development**

Puerto Rico Relay's provider is currently investigating future communication enhancements including, Caption Telephone, Real-Time Captioning service for conference calling, Speech to Text technology, Wireless Internet Relay through cell phone devices, wireless Video Relay accessibility, Palm Pilot and Two-Way Pager utilization through relay.

Please see Appendix J Puerto Rico Relay's provider Standard Features Matrix.

### B.6 Voice Mail and Interactive Menu (Hot Key)

When the Puerto Rico Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Puerto Rico Relay's provider recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message.

This technology greatly reduces the CA's work time, as the CA does not need to make multiple outdials. In addition, Puerto Rico Relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Puerto Rico Relay's provider has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

Callers to Puerto Rico Relay services will have access to 900 services effective on August 1, 2003.

#### **Functional Standards**

## C.1 Consumer Complaint Logs

Puerto Rico Relay's provider supplies copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Puerto Rico. Further, Puerto Rico Relay's provider maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to Puerto Rico.

By June 25<sup>th</sup> of each calendar year, Puerto Rico Relay's provider submits a copy of the 12-month complaint log report for the period of June 1-May 31, as well as a summary of the complaint log.

W265706.1 11

## CERTIFICATE OF SERVICE

I hereby certify that on this 8<sup>th</sup> day of July, 2003, a copy of the Telecommunications Regulatory Board of Puerto Rico's Application for Renewal of Certification of Telecommunications Relay Service was served by mail (or by Federal Express, International Service where marked with an asterisk (\*)) on the following:

Marlene H. Dortch Secretary Federal Communications Commission 236 Massachusetts Avenue, NE Washington, DC 20002

Erica Myers Consumers and Governmental Affairs Bureau Federal Communications Commission 236 Massachusetts Avenue, NE Washington, DC 20002

\*Sprint Relay 304 Ponce De León, Suite 801 Hato Rey, PR 00936

Qualex International Portals II 445 12<sup>th</sup> Street, SW Room CY-B402 Washington, DC 20554

Maria P. Sklar